

<p style="text-align: right;">Page 98</p> <p>1 A. Okay.</p> <p>2 Q. Can you tell me what this is?</p> <p>3 A. This was a fertility cycle that I went through.</p> <p>4 And that I would be out for those given days but</p> <p>5 I actually wasn't out for those days. I went in</p> <p>6 and took some work home and worked from home for</p> <p>7 a few of them.</p> <p>8 Q. What were the dates of this absence?</p> <p>9 A. Well, they're saying June 20th to June 27th.</p> <p>10 Q. Did you take any of that period off?</p> <p>11 A. Yes.</p> <p>12 Q. How many days did you take off?</p> <p>13 A. Probably -- I'm just going by memory of the</p> <p>14 cycle, what the cycles are like. Probably maybe</p> <p>15 three or four of the days.</p> <p>16 Q. Who was the doctor that signed off on this, if</p> <p>17 you know?</p> <p>18 A. I don't know who did -- I'm trying to think. It</p> <p>19 was a part of Dr. Rein's team so it would have</p> <p>20 been one of the doctors within his group. I</p> <p>21 can't read his signature so I really don't know.</p> <p>22 Q. Is the Brigham and Women's Hospital where you</p> <p>23 received your fertility treatments?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 100</p> <p>1 Q. And is this your application for salary</p> <p>2 continuance with Taylor during your FMLA leave?</p> <p>3 A. Yes. Now that I see the title on top, that's</p> <p>4 what it's referred to as.</p> <p>5 Q. All right. I'm handing you now what's been</p> <p>6 marked as Deposition Exhibit No. 6. Would you</p> <p>7 take a moment to review that, please?</p> <p>8 A. Okay.</p> <p>9 Q. Is that your signature on the last page of</p> <p>10 Deposition Exhibit No. 6?</p> <p>11 A. Yes.</p> <p>12 Q. Can you tell me what this is?</p> <p>13 A. This looks like a combination of office paperwork</p> <p>14 from Jansson for the leave that I took in</p> <p>15 October, 2001 and it also looks like a form that</p> <p>16 I believe Dr. Rein had to fill out and sign. So</p> <p>17 they're copies of both.</p> <p>18 Q. This was your Family and Medical Leave Act leave</p> <p>19 from October to November of 2001, correct?</p> <p>20 A. Yes.</p> <p>21 Q. Do you claim that Jansson retaliated against you</p> <p>22 for taking this leave?</p> <p>23 A. No.</p> <p>24 Q. Did they impede or otherwise prevent you from</p>
<p style="text-align: right;">Page 99</p> <p>1 Q. Is that different from the North Shore Medical</p> <p>2 Center?</p> <p>3 A. Yes. It's a combination of two places. You go</p> <p>4 for part of your treatment in the North Shore.</p> <p>5 Dr. Rein's affiliated with Brigham and Women's so</p> <p>6 you actually do the part of the procedure, the</p> <p>7 surgical part of the procedure you actually do at</p> <p>8 Brigham's.</p> <p>9 Q. I'm handing you what's been marked as Exhibit No.</p> <p>10 4. Would you please review that?</p> <p>11 A. Okay.</p> <p>12 Q. Can you tell me what that is?</p> <p>13 A. This is a letter from Dr. Rein explaining a</p> <p>14 particular procedure that I was going to be going</p> <p>15 through during my next fertility cycle. And he</p> <p>16 was recommending that I medically -- for medical</p> <p>17 reasons take a particular amount of time off.</p> <p>18 Q. I'm handing you what's been marked as Deposition</p> <p>19 Exhibit No. 5. Would you take a moment to review</p> <p>20 that, please?</p> <p>21 A. Okay.</p> <p>22 Q. Is that your signature on the second page of</p> <p>23 Exhibit No. 5?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 101</p> <p>1 asserting your rights under the Family and</p> <p>2 Medical Leave Act for taking this leave?</p> <p>3 A. No.</p> <p>4 Q. On the second page of Exhibit 6, towards the</p> <p>5 bottom, it says "Paid benefits SCP." Do you know</p> <p>6 what that stands for?</p> <p>7 A. No.</p> <p>8 Q. Do you claim that Jansson did not fulfill any of</p> <p>9 its duties or obligations under the Family and</p> <p>10 Medical Leave Act when it granted you this leave?</p> <p>11 A. What was the first part of the question? Did I</p> <p>12 --</p> <p>13 Q. Are you claiming that Jansson failed to --</p> <p>14 MR. PALMQUIST: Could you read it back?</p> <p>15 I'm sorry.</p> <p>16 A. I just needed that first part.</p> <p>17 Q. Okay.</p> <p>18 A. I believe I want to say no but I just want to</p> <p>19 make sure.</p> <p>20 (Question read.)</p> <p>21 A. No.</p> <p>22 Q. Do you claim that Jansson took any adverse</p> <p>23 employment action against you for your having</p> <p>24 asserted or having taken this leave?</p>

<p style="text-align: right;">Page 102</p> <p>1 A. No.</p> <p>2 Q. I'm handing you what's been marked as Deposition</p> <p>3 Exhibit No. 7. Take a moment to review that,</p> <p>4 please, and let me know when you're done.</p> <p>5 A. Okay.</p> <p>6 Q. Can you tell me what this is?</p> <p>7 A. This is a complaint filed with the discrimination</p> <p>8 board in Massachusetts.</p> <p>9 Q. And is everything in this Exhibit 7 true and</p> <p>10 accurate to the best of your knowledge?</p> <p>11 A. Yes.</p> <p>12 Q. Is that your signature on the bottom of page one</p> <p>13 of Exhibit 7?</p> <p>14 A. Yes.</p> <p>15 Q. And is that your signature -- I'm sorry. Strike</p> <p>16 that. There is no signature.</p> <p>17 I would like you to turn to page two of</p> <p>18 Exhibit 7 and review paragraph number seven.</p> <p>19 A. Okay.</p> <p>20 Q. What led you to believe that it was medically</p> <p>21 necessary for you to decrease your hours to a</p> <p>22 four-day work week rather than the five or six</p> <p>23 days that you had previously been working?</p> <p>24 A. In talking to my fertility specialist in regards</p>	<p style="text-align: right;">Page 104</p> <p>1 listing of comments that you allege Ms. Osoff</p> <p>2 made to you on December 7th. And it's December</p> <p>3 7, 2001; is that correct? Is this a typo?</p> <p>4 A. That's a typo.</p> <p>5 Q. Have we talked about all of those comments here</p> <p>6 today?</p> <p>7 A. We've covered all of them.</p> <p>8 Q. On the last page of Exhibit 7, paragraph 12, you</p> <p>9 claim that "Unable to endure Miss Osoff's tirade</p> <p>10 of discriminatory comments and arbitrary pay cut,</p> <p>11 I was constructively discharged from my</p> <p>12 position."</p> <p>13 Do you know what that means?</p> <p>14 A. Yes.</p> <p>15 Q. What does that mean to you?</p> <p>16 A. Well, I believe what it's saying here is Arlene's</p> <p>17 comments to me being discriminatory between my</p> <p>18 pregnant and my job and then between that and the</p> <p>19 pay cut, that I was constructively discharged</p> <p>20 from my position. I mean, it pretty much says it</p> <p>21 right there.</p> <p>22 Q. What does "constructively discharged" mean to</p> <p>23 you?</p> <p>24 A. Constructively discharged means that the</p>
<p style="text-align: right;">Page 103</p> <p>1 to my newly discovered pregnancy, I asked him to</p> <p>2 give me an outline of the -- what to expect the</p> <p>3 next couple of months. And he explained to me</p> <p>4 that I would be considered a high-risk pregnancy</p> <p>5 and that I needed to be careful, to take care of</p> <p>6 myself. And as I said to you before, to be</p> <p>7 responsible.</p> <p>8 And that's when -- my husband was</p> <p>9 present with me and he said that, you know, we</p> <p>10 should discuss work. And I talked to Dr. Rein</p> <p>11 about that. And he said that I was able to work</p> <p>12 but to not go overboard. Just to be careful.</p> <p>13 Because I wasn't quite out of the woods yet.</p> <p>14 Q. Did you tell Miss Osoff it was medically</p> <p>15 necessary for you to work a four-day work week?</p> <p>16 A. I told her what Dr. Rein said. That we had</p> <p>17 discussed it.</p> <p>18 Q. And Dr. Rein hadn't specifically ordered you to</p> <p>19 work four days a week; is that correct?</p> <p>20 A. No.</p> <p>21 Q. No, that's not correct, or no, he didn't order</p> <p>22 you to work four days a week?</p> <p>23 A. No. He didn't order me to work four days a week.</p> <p>24 Q. On the third and fourth pages of Exhibit 7 is a</p>	<p style="text-align: right;">Page 105</p> <p>1 situation at hand -- in other words, we couldn't</p> <p>2 come to an agreement about what we were trying to</p> <p>3 negotiate or compromise on.</p> <p>4 Q. And so you were justified in leaving?</p> <p>5 A. Yes. I wasn't actually fired but I was asked to</p> <p>6 leave and to write my resignation.</p> <p>7 Q. Under paragraph 14, you claim that Jansson's</p> <p>8 treatment of you constitutes discrimination on</p> <p>9 the basis of gender and pregnancy. Have we</p> <p>10 talked today about all of the allegations that</p> <p>11 you claim constitute discrimination on the basis</p> <p>12 of gender and pregnancy?</p> <p>13 A. Yes.</p> <p>14 Q. Are there any other allegations that you haven't</p> <p>15 talked about here today that you are including in</p> <p>16 your claim against the company?</p> <p>17 A. No.</p> <p>18 Q. Paragraph 14 also indicates that you believe that</p> <p>19 Jansson's treatment of you constitutes a</p> <p>20 violation of the Family and Medical Leave Act.</p> <p>21 How do you claim Jansson violated the Family and</p> <p>22 Medical Leave Act?</p> <p>23 A. Well, I'm not sure that I'm extremely well read</p> <p>24 on the Family and Medical Leave Act and I went</p>

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1 through the guidance of my counsel on that.
 2 Q. But as you sit here today, you can't tell me any
 3 facts that lead you to believe that the company
 4 violated the Family and Medical Leave Act with
 5 regard to your situation; is that correct?
 6 A. Well, in not ensuring my position to be there for
 7 me when I come back from my maternity leave, I
 8 believe that there is some type of discrimination
 9 there.
 10 Q. Did you ever take maternity leave?
 11 A. No, but it was on the table open for discussion.
 12 Q. Paragraph 16 of Exhibit 7 indicates you claim you
 13 have suffered emotional distress and lost wages
 14 as a result of Jansson and Miss Osoff's treatment
 15 of you. Have we talked about all the ways that
 16 you claim to have suffered emotional distress
 17 here today?
 18 A. Yes.
 19 Q. How much in lost wages are you claiming you have
 20 suffered as a result of Jansson and Miss Osoff's
 21 treatment of you?
 22 A. At least a year's salary.
 23 Q. And what do you base that on?
 24 A. I base that on from the time I left and my

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1 aggressive job search through my pregnancy,
 2 during the time that my child was born and after.
 3 I wasn't able to retrieve or bounce back from
 4 that within that year. And still to this day.
 5 Q. Any other lost wages you're claiming in this
 6 matter?
 7 A. I'm not sure if it's considered wages but my
 8 401(k) I had invested in, I think there was a
 9 technicality of dates and that I wasn't entitled
 10 my matched amount so I'm asking for that.
 11 Q. Can you explain that to me a little bit? You had
 12 an account and --
 13 A. Yes.
 14 Q. Your employer matched a certain amount?
 15 A. There was a certain amount vested after a certain
 16 date and there was a discrepancy in the date. I
 17 think it was a matter of days.
 18 Q. How much was in the 401(k)?
 19 A. You know, I don't remember offhand. It was
 20 several thousand. And then I believe there was
 21 around 2,000 that was -- that I lost because of
 22 that date change. And --
 23 Q. These are funds that would have been contributed
 24 to the account if you remained employed to a

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1 certain date?
 2 A. Yes.
 3 Q. And this would have been contributed from the
 4 company to your account?
 5 A. Yes.
 6 Q. A sort of matching fund?
 7 A. Yes.
 8 Q. Is there any other element of damages that you
 9 are claiming in this matter?
 10 A. No.
 11 Q. I'm handing you what's been marked as Patrick
 12 Exhibit No. 8. It's a legal pleading dated
 13 October 24, 2002. And the last page of Exhibit 8
 14 is an affidavit of Laura E. Patrick dated October
 15 24, 2002. Is that your signature on the last
 16 page?
 17 A. Yes.
 18 Q. In paragraph one, you indicate, "At no time did I
 19 request to change my position from an exempt
 20 position to a nonexempt position." Do you know
 21 what that means?
 22 A. No, because it's never been described to me in
 23 that wording before.
 24 Q. Do you know who makes determinations about exempt

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1 and nonexempt employment at Jansson?
 2 A. I believe Arlene to make all those decisions.
 3 Q. In paragraph three, you indicate, "Miss Osoff
 4 never told me that all managerial and salary
 5 positions at Jansson have built into their salary
 6 structure an assumption of five to seven hours of
 7 overtime."
 8 Is that still an accurate statement?
 9 A. Yes, it is.
 10 Q. Is it your claim that she never told you anything
 11 about the assumptions that went into setting
 12 salaries for salary level positions?
 13 A. No.
 14 Q. Paragraph four you indicate, "At no time did I
 15 tell Miss Osoff that I wanted to decrease my
 16 responsibilities."
 17 Is that a true statement?
 18 A. Yes, it is.
 19 Q. Paragraph six, "I know the identity of the
 20 employee referred to as NL. Upon reducing her
 21 schedule, NL was tasked with the same exact --
 22 the exact same responsibilities she had before
 23 her reduction."
 24 How do you know that?

28 (Pages 106 to 109)

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1 A. It was through my observation. And she was one
 2 of the individuals that I wanted to speak to in
 3 regards to that.
 4 Q. I think we talked about -- this is Nicole Lee?
 5 A. Yes.
 6 Q. And you never talked to her?
 7 A. No. I talked to her while she still worked at
 8 Jansson because her office was right next to
 9 mine.
 10 Q. Did you talk about her change from salary to
 11 hourly while she was still working there?
 12 A. I believe yes, we did. And she said that she was
 13 in agreement but that when -- that she would be
 14 doing less responsibility so I thought her pay
 15 cut was because she had stepped down from her
 16 position. But she had mentioned to me that she
 17 was still doing the same work.
 18 Q. Did she complain to you while she was still
 19 working there that she was still doing the same
 20 work?
 21 A. She made a statement to me once about it, which
 22 is something that I had remembered, which is why
 23 I wanted to talk to her to confirm.
 24 Q. So when Arlene Osoff told you that your hourly

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1 wage was going to be different from what you
 2 expected, that wasn't a surprise to you, was it?
 3 A. Yes, it was.
 4 Q. Yet you had seen other employees go from salary
 5 to hourly and understood that their pay had
 6 changed?
 7 A. It was my impression that it was because they
 8 were doing less responsibility. In other words,
 9 they stepped down from their original position.
 10 Q. And the job you were proposing had fewer
 11 responsibilities than the one that you performed
 12 before you went out on leave; isn't that right?
 13 A. No, it wouldn't.
 14 Q. All right. I'm handing you now what's been
 15 marked as Deposition Exhibit No. 9. It's a copy
 16 of the complaint in this matter.
 17 Have you had a chance to review that?
 18 A. Yes.
 19 Q. Have you seen that before?
 20 A. I don't believe so. I'm not sure. A lot of
 21 these statements have been discussed.
 22 Q. Is there anything in this document that we
 23 haven't talked about yet today?
 24 A. I believe we've touched on everything.

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1 Q. You applied for unemployment benefits after you
 2 left Jansson?
 3 A. Yes.
 4 Q. And were they initially denied?
 5 A. Yes.
 6 Q. Why were they initially denied?
 7 A. I don't know the exact reason. I just know that
 8 the impression I was getting is that the other
 9 party, because of the response from the other
 10 party, they made the decision that it would not
 11 be covered.
 12 Q. And you appealed that decision?
 13 A. Yes, I did.
 14 Q. Did you have the help of an attorney?
 15 A. Yes, I did.
 16 Q. And was there an actual hearing on your appeal?
 17 A. Yes, there was.
 18 Q. And was Jansson represented at that hearing?
 19 A. No, it was not.
 20 Q. Did you go to the hearing?
 21 A. Yes.
 22 Q. And your attorney went with you?
 23 A. Yes.
 24 Q. Who else was there?

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1 A. Just the individual who was conducting the
 2 hearing.
 3 Q. What happened at the hearing?
 4 A. They had a set of questions that they asked me.
 5 I answered them. And after we were finished, she
 6 said she would make a decision and let me know.
 7 Q. Okay. Do you remember any of the questions they
 8 asked you?
 9 A. Similar to yours.
 10 Q. On page five of Exhibit 9, paragraph 33 alleges
 11 that "Jansson's policy of arbitrarily pro rating
 12 downward the hourly salary rate of employees
 13 working less than 40 hours per week disparately
 14 impacts females in violation of Massachusetts
 15 General Law Chapter 151B."
 16 Do you know what that means?
 17 A. I don't know exactly what Chapter 151B is. But
 18 this policy that Arlene refers to seems to
 19 directly affect the women in the company that
 20 became pregnant and reduced their hours.
 21 Q. Why do you claim it only impacts people who are
 22 pregnant?
 23 A. Because the individuals that I have spoken to or
 24 felt experienced this were all females.

29 (Pages 110 to 113)

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1 Q. And those were Wendy, Anne and Nicole?
 2 A. Yes.
 3 Q. Anyone else?
 4 A. There are other women that experienced the same
 5 situation. Darlene, I can't remember her last
 6 name. And Lucia McDougall. All of which I was
 7 under the impression was taking on less
 8 responsibility, taking -- doing a different job.
 9 In turn, I thought their change in salary
 10 reflected that.
 11 MS. DEVER: I just ask, could we take
 12 another break? I know --
 13 MR. PALMQUIST: Sure.
 14 MS. DEVER: I don't know if you're
 15 reaching toward the end.
 16 MR. PALMQUIST: I am. I'm getting
 17 close. I'm getting very close.
 18 MS. DEVER: Okay.
 19 (Recess.)
 20 (Question and answer read.)
 21 Q. How do you know those individuals didn't have
 22 decreased responsibilities?
 23 A. I'm sorry. How did I --
 24 Q. How do you know that -- let's start with Wendy

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1 Canty.
 2 A. Mm-hmm.
 3 Q. Did not have decreased responsibilities.
 4 A. How did I know that Wendy didn't have --
 5 Q. Yes. After she came back from her leave.
 6 A. When I had talked to her over the phone, she said
 7 that she really was doing the same job. Pretty
 8 much the same tasks.
 9 Q. She told you?
 10 A. Yes.
 11 Q. Okay. Was that true for Anne as well?
 12 A. Yes.
 13 Q. Did you ever talk to Lucia McDougall about that?
 14 A. No, not really. It was just an observation.
 15 Q. So no one told you that she was doing the same
 16 responsibilities? You just observed that you
 17 thought she was?
 18 A. Yes. And technically she was -- her title was
 19 taken away from her and assigned to someone else.
 20 Q. But you don't personally know what duties and
 21 responsibilities she had in her position, do you?
 22 A. I do because I worked closely with her.
 23 Q. Did you assign her duties and responsibilities?
 24 A. No. That wasn't my job.

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1 Q. Who assigned the duties and responsibilities to
 2 her?
 3 A. Arlene.
 4 Q. How do you know Darlene's responsibilities were
 5 not reduced?
 6 A. She worked in customer service as well. And
 7 again, it was just my observation. I believe she
 8 was taking on extra responsibilities during
 9 somebody else's leave and then when it was her
 10 turn, she also was -- she was doing different
 11 responsibilities. So it was my impression
 12 through my observation that Darlene was doing
 13 less responsibility.
 14 Q. Okay. And I think we talked about Nicole Lee?
 15 A. Mm-hmm.
 16 Q. She told Wendy that her duties -- she didn't
 17 think her duties decreased? Is that correct?
 18 A. I don't know what she told Wendy. I know that
 19 she told Wendy that she would be willing to talk
 20 to me and we would work something out for all of
 21 us to meet. I think that's what we were trying
 22 to do is to meet.
 23 Q. You don't have any personal knowledge of what
 24 Nicole Lee's duties and responsibilities were in

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1 her job, do you?
 2 A. No, just an impression of what they would be like
 3 because she worked for the commercial division
 4 customer service and since I was familiar with
 5 the setup of customer service, she was the
 6 manager and I understood what the structure of it
 7 was. And she had a very small office so she was
 8 still taking on the same responsibilities even
 9 after technically she was not the office manager
 10 there.
 11 Q. And you don't know what your duties and
 12 responsibilities would have been under your
 13 four-day work week because you never started
 14 that, did you?
 15 A. I knew what my responsibilities would be because
 16 I knew what my job was and what needed to be
 17 done.
 18 Q. But you never worked that four-day work week, did
 19 you?
 20 A. Obviously. We never got to that point.
 21 Q. Other than these examples that we've just talked
 22 about, are you aware of any facts that lead you
 23 to believe that Jansson's, quote, unquote, policy
 24 of pro rating downward the hourly salary rate of

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<p style="text-align: right;">Page 118</p> <p>1 employees working less than 40 hours per week has</p> <p>2 a disparate impact on females? Any other facts</p> <p>3 that leads you to believe that, other than those</p> <p>4 examples that we've talked about?</p> <p>5 A. No.</p> <p>6 Q. Okay. Are you aware of any situations where this</p> <p>7 policy was applied to males?</p> <p>8 A. No.</p> <p>9 Q. Would you make the same claim if the policy was</p> <p>10 applied to males?</p> <p>11 A. Good question. I think I would -- I think it</p> <p>12 would depend on if they were doing the same job.</p> <p>13 If they were doing the same job, why should they</p> <p>14 take a cut in pay just for doing the same job but</p> <p>15 within different hours? If he was taking less</p> <p>16 responsibility and doing a different job that was</p> <p>17 valued at a less pay rate, then I could</p> <p>18 understand that that applies.</p> <p>19 Q. But if it were applied to a man, then it wouldn't</p> <p>20 be discriminatory, would it?</p> <p>21 A. I think it's discriminatory towards the position</p> <p>22 as well. I am just familiar with it being with</p> <p>23 women so it's -- it gives me the impression that</p> <p>24 it really is a policy that seems to strongly</p>	<p style="text-align: right;">Page 120</p> <p>1 (Employee Acknowledgment marked Exhibit</p> <p>2 No. 12.)</p> <p>3 Q. I'm handing you two documents marked Deposition</p> <p>4 Exhibits 11 and 12. Deposition Exhibit 11 is a</p> <p>5 copy of the employee handbook at Jansson</p> <p>6 effective January 1, 2001. And Deposition 12,</p> <p>7 Exhibit 12 is an acknowledgment form dated April</p> <p>8 11, 2001.</p> <p>9 You don't have to look at the whole</p> <p>10 handbook but if you could tell me if that's your</p> <p>11 signature on Deposition Exhibit No. 12.</p> <p>12 A. Yes, it is.</p> <p>13 Q. And did you receive a handbook while you were</p> <p>14 employed by Jansson?</p> <p>15 A. Yes.</p> <p>16 Q. Did you read it?</p> <p>17 A. Yes.</p> <p>18 Q. Does Deposition Exhibit 11 look like the handbook</p> <p>19 you received? Take some time to look at it if</p> <p>20 you need to.</p> <p>21 A. Without knowing the exact content of this, it</p> <p>22 looks like a copy of it. It was a booklet.</p> <p>23 Q. Did you receive more than one handbook when you</p> <p>24 were at Jansson?</p>
<p style="text-align: right;">Page 119</p> <p>1 discriminate women that happen to get pregnant.</p> <p>2 Q. All right. I'm handing you now what's been</p> <p>3 marked as Deposition Exhibit No. 10. These are</p> <p>4 some disclosures that your attorney made in this</p> <p>5 case. Have you seen these before?</p> <p>6 A. I haven't actually seen this paperwork. I never</p> <p>7 actually saw my personnel file. I did see the</p> <p>8 correspondence between myself and Jansson</p> <p>9 concerning the settlement demand and the charge</p> <p>10 of discrimination. If that's what you're</p> <p>11 referring to.</p> <p>12 Q. I'm just asking if you've seen this before.</p> <p>13 A. Okay.</p> <p>14 Q. Have you seen it before today?</p> <p>15 A. I haven't seen this actual paper.</p> <p>16 Q. Before today. Okay. Were you aware that Jansson</p> <p>17 made an offer of reinstatement to you?</p> <p>18 A. Define "reinstatement."</p> <p>19 Q. Giving you your job back.</p> <p>20 A. Yes. Through Joel.</p> <p>21 Q. Why did you reject that?</p> <p>22 A. I didn't feel confident working for a company</p> <p>23 that I felt didn't support me.</p> <p>24 Q. We're going to mark one more here.</p>	<p style="text-align: right;">Page 121</p> <p>1 A. Just this one.</p> <p>2 MR. PALMQUIST: I just want to take a</p> <p>3 very short break. I think we're probably done.</p> <p>4 MS. DEVER: Okay.</p> <p>5 (Recess.)</p> <p>6 Q. Have we talked about all of the facts that</p> <p>7 underlie your lawsuit against the company here</p> <p>8 today?</p> <p>9 A. I believe we have.</p> <p>10 Q. Is there anything that you can think of before we</p> <p>11 end that you are asserting that was unfair or</p> <p>12 discriminatory or retaliatory by Jansson?</p> <p>13 A. We pretty much discussed it.</p> <p>14 MR. PALMQUIST: I have no further</p> <p>15 questions.</p> <p>16 MS. DEVER: I have no questions.</p> <p>17 MR. PALMQUIST: Okay.</p> <p>18 (Whereupon, the deposition was</p> <p>19 concluded at 2:36 p.m.)</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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1 Excerpt from Rule 30(e):
2 Submission to Witness; Changes; Signing.

3 When the testimony is fully transcribed,
4 the deposition shall be submitted to the witness
5 for examination and shall be read to or by
6 him/her, unless such examination and reading are
7 waived by the witness and by the parties. Any
8 changes in form or substance which the witness
9 desires to make shall be entered upon the
10 deposition by the officer with a statement of the
11 reasons given by the witness for making them.

12 *****

13 I, Laura Patrick, have examined the above
14 transcript of my testimony and it is true and
15 correct to the best of my knowledge, information
16 and belief. Any corrections are noted on the
17 errata sheet.

18 Signed under the pains and penalties of
19 perjury this day of , 2005.

20 -----
21 Deponent's Signature
22 On this day of , 2005, before
23 me, the undersigned notary public, personally
24 appeared , proved to me through
satisfactory evidence of identification, which
were , to be the person whose name is
signed on the preceding or attached document, and
who swore or affirmed to me that the contents of
the document are truthful and accurate to the
best of his/her knowledge and belief.

25 -----
26 Notary Public
27 My commission expires:

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1
2 COMMONWEALTH OF MASSACHUSETTS
3 ESSEX, SS.

4 I, Susan L. Prokopik, Registered Merit
5 Reporter and Notary Public duly commissioned and
6 qualified in and for the Commonwealth of
7 Massachusetts do hereby certify that there came
8 before me on the 25th day of January, 2005 the
9 person hereinbefore named, who was satisfactorily
10 identified by me and duly sworn to testify to the
11 truth of her knowledge concerning the matters in
12 controversy in this cause; that she was thereupon
13 carefully examined upon her oath and her
14 examination reduced to typewriting under my
15 direction; and that the deposition is a true and
16 accurate record of the testimony given by the
17 witness.

18 I further certify that I am not
19 interested in the cause of this action.

20
21 SUSAN L. PROKOPIK, RMR, CRR
22 (CSR #124893)
23

24 My commission expires:
April 15, 2005

32 (Pages 122 to 123)

KACZYNSKI REPORTING

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